

AB:AMR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. § 922(g)(1))

REGINALD SANDERS,

Case No. 23 MJ 81

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MONIQUE BRAMBLE, being duly sworn, deposes and states that she is a Postal Inspector with the United States Postal Inspection Service, duly appointed according to law and acting as such.

On or about January 25, 2023, within the Eastern District of New York and elsewhere, the defendant REGINALD SANDERS, having been convicted in a court of one or more crimes punishable by imprisonment for a term exceeding one year, did knowingly and intentionally possessing in and affecting commerce a firearm, to wit, a 9mm Ruger semi-automatic pistol and ammunition.

(Title 18, United States Code, Section 922(g)(1))

The source of your deponent's information and the grounds for her belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Postal Inspector with the United States Postal Inspection Service (“USPIS”) and have been involved in the investigation of numerous cases involving theft and robbery of mail matter, money, and other property of the United States, including armed robberies of Postal employees. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; my review of video footage; and reports of other law enforcement officers involved in the investigation.

2. On January 24, 2023, at 1834 Park Place, Brooklyn, New York, a male wearing a black ski mask (“the perpetrator”) approached a United States Postal Service (“USPS”) mail carrier who was delivering mail to 1834 Park Place. The perpetrator showed the mail carrier a firearm and told the mail carrier, in substance, “Give me the keys.” The mail carrier gave the perpetrator the mail carrier’s arrow keys, which act as universal keys that allow USPS mail carriers to access various buildings and relay boxes, among other USPS boxes, in order to deliver mail. The perpetrator then left the building.

3. Video footage from shortly before the robbery captures the perpetrator getting out of a gray Dodge Charger with a black spoiler, black rims, no visible registration sticker, no visible front license plate, and a black cover over the rear license plate. The perpetrator is shown getting back into the same car after the robbery, and the car is shown driving away after the perpetrator gets back into it.

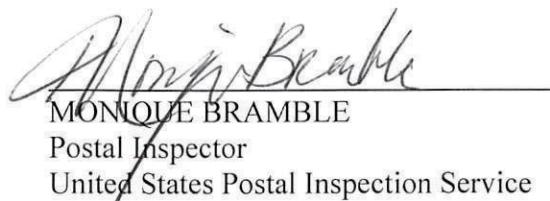
4. The following day, January 25, 2023, Police Officer Stephen Rice of the 73rd Precinct and other members of the New York City Police Department (“NYPD”) encountered a gray Dodge Charger with a black spoiler, black rims, no visible registration sticker, no visible front license plate, and a black cover over the rear license plate. The car was being driven by the defendant REGINALD SANDERS, who was the sole occupant at the time.

The police officers stopped the car, instructed the defendant to get out of the car, and asked, in substance, whether he had any weapons. The defendant responded, in substance, "I have a weapon." Officer Rice then took a loaded a 9mm Ruger semi-automatic pistol from the defendant's waistband. The gun was loaded with one cartridge in the chamber and 14 additional cartridges in the magazine.

5. I have reviewed an NYPD "lost/stolen firearm inquiry" report which indicates that the gun possessed by the defendant REGINALD SANDERS was previously reported stolen in Charlotte, North Carolina.

6. I have reviewed the defendant REGINALD SANDERS's criminal history record, which reveals that on January 24, 2013, he was convicted of Robbery in the First Degree, in violation of New York Penal Law Section 160.15(4), which is a crime punishable by a term of imprisonment of more than one year. The defendant's criminal history record indicates that for that conviction, he was sentenced principally to five years' imprisonment and 30 months of post-release supervision.

WHEREFORE, your deponent respectfully requests that the defendant REGINALD SANDERS be dealt with according to law.



MONIQUE BRAMBLE
Postal Inspector
United States Postal Inspection Service

Sworn to before me this
26th day of January, 2023



THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK